

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

<p>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</p>	<p>Master File No. 2:12-MD-02327 MDL No. 2327</p>
<p>THIS DOCUMENT RELATES TO: <i>Cases Listed in Plaintiffs' Exhibit A</i></p>	<p>Wave 9 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</p>

**NOTICE OF ADOPTION OF PRIOR RESPONSES IN OPPOSITION TO DAUBERT
MOTION TO EXCLUDE EXPERT TESTIMONY OF SHELBY THAMES, M.D.**

In response to Plaintiffs' notice adopting their prior *Daubert* motions as to Shelby Thames, M.D. (Doc. 8295 (adopting Docs. 2039, 2455, 2839, 8071, 2042, 2458, 2841, 8073, 2247, 2621, 2027)), Defendants hereby adopt and incorporate by reference their prior responsive briefing (Docs. 2187, 2553, 2957) in opposition to the motion to exclude Dr. Thames's testimony. Defendants respectfully request that the Plaintiffs' motion be denied for the reasons stated in the prior briefing.

This notice applies to the Wave 9 cases identified in Plaintiffs' Exhibit A.¹

Respectfully submitted,

/s/ William M. Gage
William M. Gage (MS Bar No. 8691)
Butler Snow LLP
1020 Highland Colony Parkway

¹ Defendants note that several of the cases listed in Plaintiffs' Exhibit A have been terminated since the filing of their motion: Sandra Barron (No. 2:13-cv-14834), Janice Blessing-Prosser (No. 2:17-cv-01988), Vera Boyd (No. 2:17-cv-03586), Dawn Bridges (No. 2:15-cv-13609), Joyce Clark (No. 2:15-cv-13857), Christy D. Conn (No. 2:14-cv-09938), Amanda Marie Harshbarger (No. 2:13-cv-15950), Kathleen Lindon (No. 2:16-cv-07814), Jayne and Richard Pawlisa (No. 2:15-cv-03832), Lela J. Quillen (No. 2:14-cv-14403), Lori Ransom (No. 2:13-cv-18285), Jodi Walsh (No. 2:14-cv-09375), and Melanie Watson (No. 2:13-cv-24197). No response is required in these closed matters.

Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar No. 5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage _____

William M. Gage

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